

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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**In re:**

**CORE SCIENTIFIC, INC., *et al.*,**

**Debtors.<sup>1</sup>**

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§  
§ **Chapter 11**  
§  
§ **Case No. 22-90341 (CML)**  
§  
§ **(Jointly Administered)**  
§

**SECOND SUPPLEMENTAL DECLARATION OF  
ERIC S. KOZA OF ALIXPARTNERS, LLP**

Pursuant to 28 U.S.C. § 1746, I, Eric S. Koza, state under penalty of perjury, that:

1. I am a Partner and Managing Director of AlixPartners, LLP (“**AlixPartners**”),<sup>2</sup> which has a place of business at 909 Third Avenue, Floor 30, New York, New York 10022.
2. I am duly authorized to execute this declaration on behalf of AP Services, LLC (“**APS**”), an affiliate of AlixPartners LLP.
3. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.
4. I submit this supplemental declaration in the cases of the above-captioned debtors (collectively, the “**Debtors**”) to supplement the disclosures set forth in my original declaration dated January 15, 2023 [Docket No. 285], and my first supplemental declaration dated February 15, 2023 [Docket No. 529].

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Core Scientific Mining LLC (6971); Core Scientific, Inc. (3837); Core Scientific Acquired Mining LLC (N/A); Core Scientific Operating Company (5526); Radar Relay, Inc. (0496); Core Scientific Specialty Mining (Oklahoma) LLC (4327); American Property Acquisitions, LLC (0825); Starboard Capital LLC (6677); RADAR LLC (5106); American Property Acquisition I, LLC (9717); and American Property Acquisitions, VII, LLC (3198). The Debtors’ corporate headquarters is 210 Barton Springs Road, Suite 300, Austin, Texas 78704. The Debtors’ service address is 2407 S. Congress Ave, Suite E-101, Austin, TX 78704.

<sup>2</sup> Capitalized terms used herein shall have meanings ascribed to them in the Original Declaration.

5. Unless otherwise noted, references to AP below collectively refer to AlixPartners, AP Holdings, APS, and each of their respective subsidiaries. APS wishes to disclose the following:

- As set forth in the Original Declaration, AP follows a practice to solicit from certain Investors and the members of its Boards their connections to the Parties in Interest List independent of AP. In response, one or more of the Investors or members of its Boards have offered the following disclosures:
  - CrossCountry Consulting LLC is an ordinary course professional to the Debtors. A member of AP's board of directors is also a board member of CrossCountry Consulting Holdings, Inc.
  - Judge Marvin Isgur is a bankruptcy judge to the Debtors. An AP investor or one of its affiliates had litigation matters unrelated to these chapter 11 cases in a consolidated dispute before Judge Isgur. AP was neither a plaintiff nor a defendant in the matters.
- ACM Elf St LLC and ACM ELF ST, LLC (Atalaya), lenders and UCC lien search parties to the Debtors, and affiliated entities ("**Atalaya**"), are associated companies and parent companies to former AP clients in matters unrelated to the Debtors. Atalaya is a former AP client in matters unrelated to the Debtors.
- ADQ Financial Services LLC, a customer to the Debtors, and affiliated entities, are current AP clients in matters unrelated to the Debtors.
- Aircraft Services Group Inc, a vendor and/or supplier to the Debtors, is a vendor to AP.
- Anchorage Lending CA, LLC, a lender and UCC lien search party to the Debtors, and affiliated entities, are investors to a current AP client in matters unrelated to the Debtors.
- Apollo Centre Street Partnership, L.P., Apollo Lincoln Fixed Income Fund, L.P., Apollo Moultrie Credit Fund, L.P. and Apollo Tactical Value SPN Investments, L.P., lenders to the Debtors, and affiliated entities, are current AP clients in matters unrelated to the Debtors.
- AXIS Surplus Ins Co., an insurance broker and/or insurance provider and/or surety bondholder to the Debtors, and affiliated entities, are adverse litigation parties to current AP clients in matters unrelated to the Debtors.
- Bitmain Development Inc, Bitmain Technologies Georgia Limited, Bitmain Technologies Limited, Bitmain Technology Inc. and Bitmaintech PTE LTD, customers, ordinary course professionals, vendors and/or suppliers to the Debtors, are adverse litigation parties and investors to current and former AP clients in matters unrelated to the Debtors.
- BlackRock Credit Alpha Master Fund L.P., a lender to the Debtors, and affiliated entities, are current AP clients in matters unrelated to the Debtors.

- Blakes Cassels and Graydon LLP, a vendor and/or supplier to the Debtors, is a legal services provider to AP.
- Blue Torch Capital LP, a customer and contract counterparty to the Debtors, is a parent company and professional to current and former AP clients in matters unrelated to the Debtors.
- California Institute of Technology (Caltech), an affiliated company to current officers and directors to the Debtors, is a current AP client in matters unrelated to the Debtors.
- CDW Direct and CDW Middle East FZ LLC, unsecured creditors, vendors and/or suppliers to the Debtors, and affiliated entities, are lessors to a current AP client in matters unrelated to the Debtors.
- CenturyLink and Lumen/CenturyLink, utility providers and/or utility brokers, and vendors and/or suppliers to the Debtors, are shareholders, related parties and affiliates to current AP clients in matters unrelated to the Debtors.
- Choate, Hall and Stewart LLP (“**Choate**”), a professional to the Debtors, is a professional and counsel to current and former AP clients in matters unrelated to the Debtors. Choate is a current and former AP client in matters unrelated to the Debtors.
- Chubb, Chubb Personal Excess Liability Insurance and Federal Insurance Company (Chubb), benefit providers, insurance brokers and/or insurance providers and/or surety bondholders, vendors and/or suppliers to the Debtors, and affiliated entities, are affiliates to a current AP client in matters unrelated to the Debtors.
- ComputerShare Inc., a party in interest in these bankruptcy cases, and affiliated entities, are professionals to a current AP client in matters unrelated to the Debtors.
- Constellation New Energy, Inc, a vendor and/or supplier to the Debtors, and affiliated entities, are director-affiliated companies to a current AP client in matters unrelated to the Debtors.
- Convergint Technologies LLC, a vendor and/or supplier and UCC lien search party to the Debtors, is a current AP client in matters unrelated to the Debtors.
- David Herrington is a vendor and/or supplier to the Debtors. A David Herrington is an adverse litigation party to a current AP client in matters unrelated to the Debtors. It is unclear whether these are the same individual.
- Dentons Canada LLP, a vendor and/or supplier to the Debtors, and affiliated entities, are current and former AP client in matters unrelated to the Debtors.
- Diamond Offshore Drilling, Inc., an affiliated company to current officers and directors to the Debtors, is a professional to a former AP client in matters unrelated to the Debtors.
- Digital Realty, a utility provider and/or utility broker to the Debtors, is a lessor to a former AP client in matters unrelated to the Debtors.

- Florida Blue, a benefit provider to the Debtors, is a litigation party to a current AP client in matters unrelated to the Debtors.
- Frost Brown Todd Attorneys LLC, an ordinary course professional to the Debtors, is a current AP client in matters unrelated to the Debtors.
- FTI Consulting (“FTI”), a non-Debtors’ professional in these bankruptcy cases, is a professional to current and former AP clients in matters unrelated to the Debtors. FTI is a current AP client in matters unrelated to the Debtors. FTI is a former employer of current AP employees.
- Genesis Global Capital, LLC, a lender to the Debtors, is a lender to a current AP client in matters unrelated to the Debtors.
- Globalization Partners LLC and Globalization Partners Professional Services, benefit providers to the Debtors and parties in interest in these bankruptcy cases, are former employers of a current AP employee.
- Guardian and Guardian Life, benefit providers, vendors and/or suppliers to the Debtors, are lenders to a current AP client in matters unrelated to the Debtors. Guardian is a former employer of a current AP employee.
- Hall, Estill, Hardwick, Gable Golden & Nelson, P.C., an ordinary course professional to the Debtors, is a professional, counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors.
- Hiscox Insurance Company, an insurance broker and/or insurance provider and/or surety bondholder to the Debtors, is an insurance provider to AP.
- Jackson Walker LLP, an ordinary course professional to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Kelly Services Inc., a party in interest in these bankruptcy cases, is a legal services provider to AP.
- KPMG LLP, an ordinary course professional to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Landmark American Insurance Company (RSUI), an insurance broker and/or insurance provider and/or surety bondholder to the Debtors, and affiliated entities, are lenders to a current AP client in matters unrelated to the Debtors.
- Lockton Insurance Brokers LLC, a vendor and/or supplier to the Debtors, and affiliated entities, are parent companies to a current AP client in matters unrelated to the Debtors.
- Marcum LLP, an ordinary course professional to the Debtors, is a professional to current and former AP clients in matters unrelated to the Debtors.

- McMaster-Carr, a vendor and/or supplier to the Debtors, is a former employer of current AP employees.
- Mediant Communications Inc., a vendor and/or supplier to the Debtors, is an adverse litigation party to a current AP client in matters unrelated to the Debtors.
- MetLife, a benefit provider to the Debtors, and affiliated entities, are shareholders to a current AP client in matters unrelated to the Debtors.
- Michael McCarter is a customer to the Debtors. A Michael McCarter is a director to a current AP client in matters unrelated to the Debtors. It is unclear whether this is the same individual.
- Morgan, Lewis & Bockius LLP, an ordinary course professional to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Nomura Corporate Funding Americas, LLC, a customer and contract counterparty to the Debtors, and affiliated entities, is a former employer of current AP employees.
- NVIDIA Corporation, a customer and contract counterparty to the Debtors, is a litigation party to a former AP client in matters unrelated to the Debtors.
- Och Ziff Capital Management, LP and Sculptor Capital Management, fka Och Ziff Capital Management, LP, affiliated companies to current officers and directors to the Debtors, are shareholders to a current AP client in matters unrelated to the Debtors.
- Oracle America, Inc., an ordinary course professional to the Debtors, and affiliated entities, are former employers of a current AP employee.
- Parker Poe, an ordinary course professional to the Debtors, and affiliated entities, are professionals and lessors to current and former AP clients in matters unrelated to the Debtors. Parker Poe is a current AP client in matters unrelated to the Debtors.
- PJT Partners Inc, a professional to the Debtors, is a shareholder to a current AP client in matters unrelated to the Debtors.
- Quinn Emanuel Urquhart & Sullivan, LLP, an ordinary course professional to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Robson Forensic Inc, a vendor and/or supplier to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Ryan LLC, an ordinary course professional to the Debtors, is a current and former AP client in matters unrelated to the Debtors.
- Shipman & Goodwin LLP, a non-Debtors' professional in these bankruptcy cases, is a professional and counsel to current and former AP clients in matters unrelated to the Debtors.

- Sidley Austin LLP, an ordinary course professional to the Debtors and a non-Debtors' professional in these bankruptcy cases, is a current AP client in matters unrelated to the Debtors.
- Skadden, Arps, Slate, Meagher & Flom LLP, a non-Debtors' professional in these bankruptcy cases and professional to the proposed ad-hoc group of equity security holders, is opposing counsel to a current AP client in matters unrelated to the Debtors.
- Stonebriar Commercial Finance LLC and Stonebriar Finance Holdings LLC, lenders and UCC lien search parties to the Debtors and parties in interest in these bankruptcy cases, and affiliated entities, are lienholders to a current AP client in matters unrelated to the Debtors.
- Travis County, TX, a taxing authority to the Debtors, is a professional to a former AP client in matters unrelated to the Debtors.
- U.S. Bank National Association, a lender, bondholder and/or noteholder and/or indenture trustee to the Debtors and a party in interest in these bankruptcy cases, and affiliated entities ("**U.S. Bank**"), are current AP clients in matters unrelated to the Debtors. U.S. Bank is a member of the official committee of unsecured creditors that retained AP in iMedia Brands, Inc., a bankruptcy matter unrelated to the Debtors.
- Vinson & Elkins LLP, a non-Debtors' professional in these bankruptcy cases, is a professional, opposing counsel and counsel to current and former AP clients in matters unrelated to the Debtors. Vinson & Elkins LLP is a current and former AP client in matters unrelated to the Debtors. A member of AP's executive team was a Vinson & Elkins partner.
- Weil, Gotshal & Manges LLP, a professional to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Williams & Connolly LLP, an ordinary course professional to the Debtors, is a current AP client in matters unrelated to the Debtors.
- Wilmington Savings Fund Society, FSB, a lender to the Debtors, and affiliated entities, are litigation parties to a current AP client in matters unrelated to the Debtors.
- ZoomInfo Technologies, a vendor and/or supplier to the Debtors, is a vendor to AP.

6. APS does not believe that the supplemental disclosures above impact its disinterestedness. I continue to reserve the right to supplement APS's disclosures in the event that APS learns of any additional connections that require disclosure. If any new material relevant facts or relationships are discovered or arise, APS will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Dated: November 8, 2023  
New York, NY

AP Services, LLC

/s/ **Eric S. Koza**  
Eric S. Koza  
Authorized Representative